

**FINAL PHASE IVC  
FINDING OF SUITABILITY TO TRANSFER  
DEPARTMENT OF DEFENSE HOUSING FACILITY  
EXCHANGE TRIANGLE PARCEL 1  
NOVATO, CALIFORNIA**

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Prepared by

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## ABBREVIATIONS AND ACRONYMS

§	Section
µg/L	Microgram per liter
ACM	Asbestos-containing material
Act	Federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of P.L. 102-550), as codified in 42 USC §4822
BTEX	Benzene, toluene, ethylbenzene, and total xylenes
BRAC	Base Realignment and Closure
Cal/EPA	California Environmental Protection Agency
CAP	Corrective action plan
CDM	CDM Federal Programs Corporation
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERFA	Community Environmental Response Facilitation Act
CFR	<i>Code of Federal Regulations</i>
DoD	Department of Defense
DODHF Novato	Department of Defense Housing Facility Novato
DTSC	Cal/EPA Department of Toxic Substances Control
EBS	Environmental baseline survey
ECP	Environmental condition of property
EFA WEST	Naval Facilities Engineering Command, Engineering Field Activity West
EIS	Environmental impact statement
ERM-West	Environmental Resources Management-West, Inc.
FAD	Friable, accessible, and damaged
FOST	Finding of suitability to transfer
HUD	Housing and Urban Development
IT	IT Corporation
LBP	Lead-based paint
MTBE	Methyl tertiary butyl ether
NAVFAC	Naval Facilities Engineering Command
Navy	U.S. Department of the Navy
NEPA	National Environmental Policy Act
NEX	Naval Exchange
NUSD	Novato Unified School District

## ABBREVIATIONS AND ACRONYMS (Continued)

PCB	Polychlorinated biphenyl
ppm	Part per million
PRC	PRC Environmental Management, Inc.
PRG	Preliminary remediation goal
PWC	Public Works Center
RAO	Remedial action objective
RBCA	Risk-based corrective action
Reuse Plan	Hamilton Army Airfield Final Reuse Plan
RI	Remedial investigation
ROD	Record of decision
RWQCB	California Regional Water Quality Control Board, San Francisco Bay Region
SEBS	Supplemental environmental baseline survey
SSPORTS	Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth Shipyard
TPH	Total petroleum hydrocarbons
USC	<i>United States Code</i>
U.S. EPA	United States Environmental Protection Agency
UST	Underground storage tank
U&A	Uribe & Associates
VOC	Volatile Organic Compounds

## **1.0 PURPOSE**

The purpose of this finding of suitability to transfer (FOST) is to determine whether parcels of real property at the Department of Defense (DoD) Housing Facility Novato (DODHF Novato) are environmentally suitable for transfer by deed under Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in a manner protective of human health and the environment.

### **1.1 INTRODUCTION**

DODHF Novato is located on the southeastern edge of the city of Novato, adjacent to San Pablo Bay, in Marin County, California, approximately 25 miles north of San Francisco (Figure 1). DODHF Novato was divided into 126 distinct U.S Department of the Navy (Navy)-owned parcels. Of the remaining parcels, this FOST includes portions of three parcels designated 28, 29 and 30 (referred to as “the Property”). Figure 2 depicts the Property. The Property is often described as the “Sale Area” and includes Building 970, the former Naval Exchange (NEX) gas station. The Sale Area will be sold for future commercial use or as otherwise zoned by the City of Novato. This FOST was prepared in accordance with the DoD policy memorandum on properties where a release or disposal of hazardous substances or petroleum products has occurred entitled “Finding of Suitability to Transfer for Base Realignment and Closure (BRAC) Property.” (DoD 1994a).

The “Hamilton Army Airfield Final Reuse Plan” (Reuse Plan) (Bein and others 1995, as amended by the City of Novato in 1996) identifies commercial uses for the Property addressed by this FOST.

The only outstanding environmental issues at the Property are petroleum contamination in groundwater and residual contamination in soil. Since the Property will be sold before the corrective action for petroleum contamination is completed, this FOST focuses on (1) evaluating potential human health and environmental risks from exposure to petroleum contamination at the site, (2) minimizing potential risks while the corrective action is ongoing, and (3) protecting human health and the environment. All other environmental issues at the Property have been resolved. Conveyance conditions and notifications necessary to prevent risk to human health or the environment are presented in Section 7.0.

## 1.2 DOCUMENTS REVIEWED AND REFERENCED

This FOST is based on a comprehensive review of information contained in the following documents listed in chronological order:

- “Utility Technical Study for DODHF Novato.” Prepared by Bechtel National, Inc., 1985 (Bechtel 1985).
- “Risk Assessment Guide for Superfund, Volume I: Human Health Evaluation Manual (Part E, Supplemental Guidance for Dermal Risk Assessment) Interim.” Prepared by the U.S. Environmental Protection Agency (U.S. EPA), 1989 (HHEM 1989).
- “Disposal of Fluorescent Light Ballasts Containing PCBs.” Department of Navy (DoN) Policy Memorandum, 1989 (DoN 1989).
- “Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions.” Office of Solid Waste and Emergency Response Directive No. 9355.0-30. Prepared by the U.S. EPA, April 22, 1991 (EPA 1991).
- “Underground Storage Tank [UST] Removal and Preliminary Investigation, Department of Defense Housing Facility, Novato, California.” Prepared by PRC Environmental Management, Inc. (PRC), November 1992 (PRC 1992).
- “Finding of Suitability to Transfer for Base Realignment and Closure Property.” DoD Policy Memorandum, June 1, 1994 (DoD 1994a).
- “Asbestos, Lead Paint, and Radon Policies at BRAC Properties.” Memorandum from Office of the Under Secretary of Defense, October 31, 1994 (DoD 1994b).
- “Limited Community Environmental Response Facilitation Act [CERFA] Environmental Baseline Survey [EBS].” Prepared by Environmental Resources Management-West, Inc. (ERM-West), November 1994 (ERM-West 1994).
- “Basewide Environmental Baseline Survey/Community Environmental Response Facility Act Report for Department of Defense Housing Facility Novato.” Prepared by ERM-West, October 19, 1995 (ERM-West 1995a).
- “Final UST Investigation and Corrective Measures Study for Former Underground Storage Tank Sites 11, 957, and 972 at the Department of Defense Housing Facility, Hamilton Field, Novato, California.” Prepared by ERM-West, December 1995 (ERM-West 1995b).
- “Hamilton Army Airfield Final Reuse Plan.” Prepared by Robert Bein, Frost, and Associates (Bein and others), 1995 as amended by the City of Novato in 1996 (Bein and others 1995).
- “Lead-Based Paint at BRAC Installations.” Prepared by Commander, Naval Facilities Engineering Command (NAVFAC), Letter 5090 41CM/960102, April 16, 1996 (NAVFAC 1996).

- “Application for Public Benefit Transfer of Surplus Federal Real Property for Educational Uses.” Prepared by the NUSD, May 1996 (NUSD 1996).
- “Survey of Oil-filled Electrical Equipment.” Prepared by PWC, San Francisco, California, November 1996 (PWC San Francisco 1996).
- “UST Case Site No. 972, Department of Defense Housing Facility, Hamilton Field, Novato, California.” Letter prepared by California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), November 1, 1996 (RWQCB 1996).
- “BRAC Cleanup Plan.” Prepared by Environ for PWC San Francisco, February 25, 1997 (Environ 1997).
- Letter from Mr. Ken Bell of the Hamilton Field Conversion Program, April 11, 1997 (Hamilton Field Conversion Program 1997).
- “Final Environmental Baseline Survey Sampling and Analysis Screening Level Report for DODHF Novato.” Prepared by PRC and Uribe & Associates (U&A), April 15, 1997 (PRC and U&A 1997a).
- “Final Phase I Supplemental Environmental Baseline Survey [SEBS] Department of Defense Housing Facility, Novato, California.” Prepared by PRC and U&A, April 21, 1997 (PRC and U&A 1997b).
- “Sampling Report, Department of Toxic Substances Control, Department of Defense Housing Facility Novato, Non-Residential Housing.” Prepared by California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC), April 30, 1997 (DTSC 1997a).
- “Underground Storage Tank Investigation Report Review and Recommendations for Site 957/970, Department of Defense Housing Hamilton Field Novato, California.” Prepared by Battelle, May 1997 (Battelle 1997).
- “Inspection Report, Department of Toxic Substances Control, Department of Defense Housing Facility, Novato, Non-Residential Housing.” Prepared by DTSC, June 14, 1997 (DTSC 1997b).
- “No Further Action Status for Petroleum Contamination on Parcels 1, 23, 30, 59, 66, 67, 88, 95, and 126 of the Department of Defense Housing Facility, Novato.” Letter prepared by RWQCB, June 16, 1997 (RWQCB 1997a).
- “Request for Concurrence on Uncontaminated Property for the DODHF Novato, California.” Letter prepared by DTSC, June 23, 1997 (DTSC 1997c).
- “No Further Action, DODHF Novato, California.” Letter prepared by DTSC, June 30, 1997 (DTSC 1997d).
- “Field Summary Report, Storm Drain Clean-out and Sediment Removal, DoD Housing Facility, Novato, California.” Prepared by IT Corporation (IT), July 1997 (IT 1997).



- “Recommendations for Changes to Environmental Condition of Property [ECP] Status for Selected Parcels on the Department of Defense Housing Facility - Novato, Hamilton Air Force Base, Novato, California.” Letter prepared by RWQCB, November 17, 1997 (RWQCB 1997b).
- “Final Environmental Impact Statement [EIS] for the Disposal and Reuse of the Department of Defense Housing Facility, Novato, California.” Prepared by NAVFAC, Engineering Field Activity West (EFA WEST), November 1997 (EFA WEST 1997).
- Letter from Mr. Raymond Seid U.S. EPA, to Mr. Raymond LeClerc, DTSC, about no further action related to storm drains, December 4, 1997 (EPA 1997).
- “No Further Action, Department of Defense Housing Facility, Novato, California.” Letter prepared by DTSC, December 8, 1997 (DTSC 1997e).
- “Asbestos Survey Report.” Prepared by Supervisor of Shipbuilding, Conversion, and Repair, Portsmouth Shipyard (SSPORTS) Environmental Detachment, January 1998 (SSPORTS 1998a).
- “Work Plan for Soil and Groundwater Remediation at Former UST 957/970 Site, Department of Defense Housing Facility, Hamilton Field, Novato, California.” Prepared by Battelle, January 1998 (Battelle 1998a).
- “Groundwater Monitoring Plan for the Former UST Site 957/970, Department of Defense Housing Facility, Novato, California.” Revision 2.0. Prepared by Battelle, December 1998 (Battelle 1998b).
- “Asbestos Remediation Completion Report for Non-residential Buildings, Department of Defense Housing Facility, Novato California.” Prepared by SSPORTS, April 1998 (SSPORTS 1998b).
- “Polychlorinated Biphenyl (PCB) Inventory and Removal Report for High Voltage PCB Electrical Devices, DODHF Novato, California.” Prepared by SSPORTS, June 26, 1998 (SSPORTS 1998c).
- “Final UST Investigation Report for Former Underground Storage Tank Site 957/970 at Department of Defense Housing, Hamilton Field, Novato, California.” Prepared by ERM-West, June 1998 (ERM-West 1998).
- “Record of Decision [ROD] for the Disposal and Reuse of the Department of Defense Housing Facility Novato, California.” Signed by William J. Cassidy Jr., Deputy Assistant Secretary of the Navy, July 1, 1998 (Navy 1998).
- “Asbestos Debris Pickup at Department of Defense (DoD) Housing Facility, Novato, California.” Letter prepared by SSPORTS, July 21, 1998 (SSPORTS 1998d).
- “Recommended Interim Water Quality Objectives (or Aquatic Life Criteria) for Methyl Tertiary Butyl Ether [MTBE].” Prepared by RWQCB, October 1, 1998 (RWQCB 1998).

- “Final Remedial Action Plan for 800B and Ammo Hill Parcels GSA Phase II Sale Area., Hamilton Army Airfield.” December 1998. (Army 1998)
- “Final Report on Remedial Investigation and Corrective Measures Study for the UST Site at Building 827.” Prepared by AGS, Inc., October 1999 (AGS 1999).
- “Tier 3 Risk-Based Corrective Action [RBCA] Assessment for Former UST Site 957/970, Department of Defense Housing Facility, Novato, California and Adjoining Property on Hamilton Army Airfield.” Prepared by Battelle, November 24, 1999 (Battelle 1999a).
- “Draft Ecological Risk Screening Assessment for Former UST Site 957/970, Department of Defense Housing Facility and Adjoining Portions of Hamilton Army Airfield, Novato, California.” Prepared by Battelle, December 8, 1999 (Battelle 1999b).
- “Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property – A Field Guide.” Prepared by DoD and U.S. EPA, December 1999 (DoD and EPA 1999)
- “Draft Summary Report for Hydraulic Lift and Oil/Water Separator Removal from Building 970, Department of Defense Housing Facility Novato, California.” Prepared by Battelle and RRM, July 29, 2000 (Battelle and RRM 2000).
- “Order No. 00-0064: Site Cleanup Requirements for the Department of Defense Housing Facility, former Hamilton Air Force Base, Novato, California.” Prepared by RWQCB, August 1, 2000 (RWQCB 2000).
- “Groundwater Monitoring Plan for Former UST Site 957/970 at Department of Defense Housing Facility, Novato, California: Revision 4.0 – Final.” Prepared by Battelle, September 13, 2000 (Battelle 2000).
- “Transmittal of Case Closure Letter for USTs at the Department of Defense Housing Facility, Marin County, Novato, California.” Letter prepared by RWQCB, November 8, 2000 (RWQCB 2000b).
- “Approval of No Further Action for Former Dry-Cleaning and Laundry Site (Navy Parcel 4), Department of Defense Housing Facility, former Hamilton Air Force Base, Novato, California.” Letter Prepared by DTSC, January 22, 2001 (DTSC 2001).
- “Final Remedial Investigation [RI] Report for Former UST Site 957/970 at Department of Defense Housing Facility, Novato, California.” Prepared by Battelle, January 31, 2001 (Battelle 2001a).
- “Final Revised Risk Assessment for Former UST Site 957/970 at Department of Defense Housing Facility, Novato, California”, as amended. Prepared by Battelle, June 8, 2001 (Battelle 2001b).
- “Review of the Draft Revised Risk Assessment for Former UST Site 957/970, Department of Defense Housing Facility, Novato, California.” Letter Prepared by DTSC, July 13, 2001 (DTSC 2001b).

- “Draft Corrective Action Plan for Groundwater at the Former UST Site 957/970, Department of Defense Housing Facility, Novato, California.” Letter prepared by RWQCB, December 18, 2001 (RWQCB 2001)
- “Draft Remedial Design and Work Plan for Former Underground Storage Tank Site 957/970 at Department of Defense Housing Facility Novato, California.” Prepared by Battelle, February 22, 2002 (Battelle 2002a).
- “Final Corrective Action Plan for Groundwater for Former Underground Storage Tank Site 957/970, Department of Defense Housing Facility, Novato, California.” Prepared by Battelle, March 1, 2002 (Battelle 2002b).
- “Final Report, Human Health Risk Assessment of Volatile Organic Compounds in Soil Gas Near Hamilton Army Airfield, Landfill 26, Novato, California.” Prepared by CH2MHILL, December 2002 (CH2MHILL 2002).
- “Annual Site Status Report (For the Year 2002) for Former UST Site 957/970 at Department of Defense Housing Facility, Novato, California.” Prepared by Battelle, January 31, 2003 (Battelle 2003).
- “Final Asbestos Survey of Condition Report at Buildings 930, 960, 965, 969, 970, 971, 972, and 973, Department of Defense Housing Facility, Novato, California.” Prepared by CDM, January 17, 2003 (CDM 2003).
- “RWQCB Staff Approval of Report Titled ‘Draft Summary Report for Hydraulic Lift and Oil Water Separator Removal from Building 970, Department of Defense Housing Facility, Novato, California.’ Letter prepared by RWQCB, April 16, 2003 (RWQCB 2003).
- “Approval of the Human Health Risk Assessment of Volatile Organic Compounds (VOCS) in Soil Gas Near Hamilton Army Airfield, Landfill 26, Dated December 2002, Novato, California.” Letter Prepared by DTSC, April 22, 2003 (DTSC 2003).
- “Ethylbenzene: Human Health Risk Assessment for Department of Defense Housing Facility, Novato, Marin County California.” DTSC Memorandum, August 5, 2003 (DTSC 2003a).

## 2.0 PROPERTY DESCRIPTION

The Property consists of portions of Parcels 28, 29, and 30 (Figure 2). The parcels comprise a total area of approximately 2.7 acres. Utilities present on the Property include sanitary sewer lines; storm drain lines; and electric, water, and natural gas lines. Table 1 lists the individual acreage of each parcel and summarizes the status of the buildings on each parcel.

### **3.0 REGULATORY COORDINATION**

The Property is not on the United States Environmental Protection Agency's (U.S. EPA) National Priorities List. It is not subject to a Federal Facility Agreement or a Federal Facilities Site Remediation Agreement.

Representatives of the U.S. EPA, the California/EPA Department of Toxic Substances Control (DTSC), and the California Regional Water Quality Control Board (RWQCB) have been involved in a consultative role with the Navy to coordinate and oversee the environmental activities at DODHF Novato as well as the preparation of the various basewide environmental baseline surveys (EBSs). These regulatory agencies, along with the Navy, form the Base Realignment and Closure Cleanup Team (BCT).

On June 12, 2002, the BCT was notified of the initiation of this FOST. The draft FOST was provided to the regulatory agencies for their review on January 20, 2003. Comments on the draft FOST were received from the DTSC and RWQCB on April 7, 2003. All agency comments were incorporated into this document or adequately addressed by the Navy.

### **4.0 NATIONAL ENVIRONMENTAL POLICY ACT CONSIDERATIONS**

In accordance with the requirements of the National Environmental Policy Act (NEPA) of 1969, the Navy prepared an Environmental Impact Statement (EIS) to evaluate the proposed disposal and reuse of DODHF Novato (EFA WEST 1997).

A NEPA Record of Decision (ROD) was signed on July 1, 1998 (Navy 1998). The ROD concludes that the Navy's disposal of DODHF Novato and its redevelopment as reflected in the Reuse Plan, as amended, is consistent with applicable regulations and local development goals.

### **5.0 ENVIRONMENTAL CONDITION OF PROPERTY AREA TYPE**

As part of the initial basewide EBS (ERM-West 1995a) conducted for DODHF Novato, each parcel was assessed individually to identify possible environmental concerns. Subsequently, the Supplemental Environmental Baseline Survey (SEBS) (PRC and U&A 1997b) was prepared to address information gathered after completion of the basewide EBS. An environmental condition of property (ECP) area type classification was then assigned to each parcel.

This classification scheme was developed based on the 1997 Defense Authorization Act, which revised the definition of property classified as "uncontaminated." Category definitions previously referred to in

the basewide EBS as “CERFA categories” or “BRAC area types” are now referred to as ECP area types. Table 2 summarizes the definitions of each ECP area type. All Parcels identified in this FOST have been re-classified as ECP area type 2. Property classified as ECP area type 2 is considered suitable for transfer, subject to review, and is defined as an area where only release or disposal of petroleum products has occurred.

## **6.0 ENVIRONMENTAL FACTORS**

The documents listed in Section 1.2 were evaluated to identify environmental factors and resources that may warrant constraints on certain activities to substantially minimize or eliminate any threat to human health or the environment. Environmental factors and resources that require deed notifications and/or restrictions are discussed in Section 6.1 and are presented in Section 7.0.

Environmental factors and resources that do not pose a threat to human health or the environment and as a result require neither deed restrictions nor notifications of the transfer are discussed in Section 6.2.

### **6.1 ENVIRONMENTAL FACTORS THAT POSE CONSTRAINTS AND/OR REQUIRE NOTIFICATION**

#### **6.1.1 Asbestos**

DoD policy is to remediate asbestos or asbestos containing material (ACM) prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property. This remediation may be conducted by the transferee under a negotiated requirement of the transfer contract. The remediation of ACM discussed above is not required when the buildings are scheduled for demolition by the transferee; the transfer document prohibits occupation of the buildings prior to the demolition; and the transferee assumes responsibility for the management of any ACM in accordance with applicable laws.

In 1995, the industrial (non-residential) buildings at DODHF Novato were surveyed by PWC, and again surveyed in 1997 by SSPTS (SSPTS 1998a). Friable, accessible, and damaged (FAD) ACM was identified inside of Building 970 (Parcel 29). Abatement of FAD ACM found in this building was completed (SSPTS 1998b; 1998d). In December 2002, a follow-up survey was done. No friable, accessible, and damaged ACM was found inside Building 970 (CDM 2003). However, ACM is still present in the building.

### **6.1.2 Lead-Based Paint**

Lead based paint (LBP) hazards are defined in the Federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of P.L. 102-550), as codified in 42 United States Code (USC) Section (§) 4822 (Act) as “any condition that causes exposure to lead ... that would result in adverse health effects.” Lead exposure is especially harmful to young children and pregnant women. Neither Title X nor DoD Policy requires LBP inspections or assessments for structures not defined as residential property, target housing, or child occupied facilities. The Act defines target housing as any housing constructed before 1978, except any housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing for the elderly or persons with disabilities) or any zero-bedroom dwelling. The Property does not contain structures defined as residential property, target housing, or child occupied facilities. Accordingly, no LBP inspections were conducted. It is assumed however, that due to the age of the buildings or structures, LBP exists. The transferee is required to manage and/or remove, transport and dispose of LBP in accordance with all applicable Federal, State and local laws and regulations.

### **6.1.3 Petroleum Releases on the Property and Adjacent Property**

The Property is affected by petroleum contamination in soil and groundwater. The direction of groundwater flow beneath the Property is toward the north. Of the constituents in the petroleum groundwater plume beneath the Property, the primary contaminants of concern are benzene and methyl tertiary butyl ether (MTBE). The Corrective Action Plan (CAP) (Battelle 2002b) provides further detail of all contaminants detected at the Site. A benzene plume extends beneath Parcels 29 and 30 of the Property, and Parcels 18, 19, 24, and 25 of adjacent property, with the highest concentrations located beneath Parcels 19 and 29. An MTBE plume is present in groundwater and extends beneath all parcels of the Property and Parcels 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 33, 34, and 35 of adjacent property. The highest concentrations of MTBE were detected beneath Parcels 17, 18, 19, 20, and 30. Parcels 21, 22, 23, 33, 34, and 35 all lie along the west or east periphery of the MTBE groundwater plume. These adjacent parcels are identified as having MTBE groundwater contamination based on interpolated groundwater contours (using an array of groundwater sampling points) or because MTBE has been measured in wells on these parcels at low levels. Parcels 21, 22, 23, 33, 34 and 35 have never had MTBE samples collected from them with concentrations greater than the CAP’s final cleanup goal for MTBE of 13 micrograms per liter. Figures 3 and 4 show the typical extent of the MTBE and benzene plumes, respectively. Three of the parcels formerly contained underground storage tanks (USTs): Parcel

19 (UST 957), Parcel 24 (UST 972), and Parcel 29 (USTs 970-1, 970-2, 970-3, and 970-Waste Oil) (Figures 3 and 4). The following discussion summarizes the progress made at these sites since completion of the SEBS (PRC and U&A 1997b). As indicated below, corrective action is underway at former UST 957/970.

#### **6.1.3.1 Former Underground Storage Tank 972**

In 1992, UST 972 was removed from Parcel 24 (PRC 1992). Soil and groundwater samples collected during the removal contained total petroleum hydrocarbons (TPH). In 1995, a site investigation was conducted to further characterize the extent of TPH contamination (ERM-West 1995b). Analytical results for both soil and groundwater showed concentrations below action levels. A closure letter for this site was received from RWQCB on November 1, 1996 (RWQCB 1996).

#### **6.1.3.2 Former Underground Storage Tank 957/970**

From the mid-1970s to early 1990s, a former NEX gas station located on Parcel 29 and a PWC gas station located on Parcel 19 were in use, operating USTs that stored gasoline. In March 1992, UST 957, a 12,000-gallon-capacity UST containing leaded gasoline, was removed from Parcel 19 (PRC 1992). Between January 1995 and July 1996, three 10,000-gallon-capacity gasoline storage tanks (USTs 970-1, 970-2, and 970-3) were removed from Parcel 29 (ERM-West 1998). In the mid-1990s, a 1,000-gallon-capacity waste oil storage tank (UST 970-Waste Oil) associated with Building 970 and the NEX gas station was also excavated and removed. TPH, benzene, toluene, ethylbenzene, and total xylenes (BTEX) were detected in soil and groundwater samples collected during the removal of the USTs (ERM-West 1998).

In 1998, an investigation was conducted to characterize the downgradient extent of TPH contamination detected during tank removal. Investigation results indicated that the hydrocarbon plume at Parcel 29 had migrated and merged with the contaminant plume at Parcel 19 (ERM-West 1998). Because groundwater at the site was affected by fuel releases from both the NEX gas station and the PWC gas station, their respective site designations were merged and the site was labeled, "Former UST Site 957/970."

Beginning in May 1998, quarterly groundwater monitoring was conducted on the Property in accordance with the revised groundwater monitoring plan (Battelle 1998b). Groundwater was

collected from monitoring wells and analyzed for petroleum constituents, as well as indicators of monitored natural attenuation, to evaluate whether biodegradation of petroleum constituents was occurring. As of November 2002, results of the quarterly groundwater monitoring indicate that groundwater contamination concentrations are decreasing over time (Battelle 2003).

Additionally, quarterly surface water monitoring has been conducted since June 2000. Results indicate the presence of MTBE in surface water flowing into Pacheco Creek (see Figure 2 for location of Pacheco Creek). However, the maximum detected concentration in a sample collected from a storm sewer outlet leading into the creek is well below the water quality objective for protection of freshwater aquatic life (66,000 µg/L) adopted by the RWQCB (RWQCB 1998). Groundwater and surface water data are presented in periodic and annual site status reports (Battelle 2003).

The Navy conducted an Interim Remedial Action in the areas of Buildings 970 and 957 during 1998 and 1999. The objective of the action was to reduce concentrations in hot spots while site-specific investigations and evaluations were being performed to assess the risk to human health and the environment presented by gasoline constituents at the site. The action consisted of operating a coupled in-situ air-sparging and soil vapor extraction system (IAS/SVE). Significant mass removal was achieved – an estimated 23,000 lbs of gasoline were calculated to have been removed through the SVE system. In October of 1999, concentrations of gasoline constituents in the off-gas stream decreased substantially since system startup. It had been determined that the recovery potential of the existing system had been met. Because risk assessment activities indicated that concentrations at the site did not exceed risk-based screening levels, the IAS/SVE systems were shut down in October 1999. During the operation period (approximately 1 year) the average MTBE and benzene concentrations were decreased by 70 to 92% (Battelle 2002b).

In 1999, an ecological risk screening assessment was conducted to evaluate the potential risk to ecological receptors from the Former UST Site 957/970 (Battelle 1999b). Using Cal/EPA scoping methodologies and U.S. EPA guidance, samples were collected in surface water in Pacheco Creek and analyzed for MTBE. MTBE was detected, indicating that the surface water pathway is considered complete. However, risk to ecological receptors from MTBE is considered negligible because concentrations in the creek decrease rapidly downstream, thus exposure of receptors is not expected to result in toxicity (Battelle 1999b). The RWQCB approved the CAP (RWQCB 2001), which summarized the findings of the ecological risk assessment. Further, the RWQCB submitted comments on the assessment, to which the Navy



responded in the form of a response to comments table, and none of those comments were related to the conclusion that further evaluation is not required. Finally, the RWQCB has not indicated in letters, meetings, or otherwise, that the conclusion of the assessment is not acceptable to the RWQCB. Therefore, the Navy considers that the conclusion is supported by the RWQCB.

In November 1999, a Tier 3 risk-based corrective action (RBCA) assessment was conducted for the Former UST Site 957/970 (Battelle 1999a). The Tier 3 RBCA assessment compared concentrations of gasoline constituents on site against derived risk-based screening levels. Subsequent to the submission of the Tier 3 RBCA assessment, the evaluation of health risks using a different risk assessment method was requested by DTSC. This other method is a multimedia, multi-chemical risk assessment performed in the forward direction to estimate cancer risk and chemical hazard (non-cancer risk) (a baseline risk assessment), rather than in the reverse direction as was done in the RBCA assessment by deriving target concentrations (comparison of risk-based screening levels to measured concentrations).

In June 2001, a Final Revised Risk Assessment, as amended (Battelle 2001b) was prepared to supplement the Tier 3 RBCA assessment using DTSC's preferred risk assessment method. The Final Revised Risk Assessment evaluated the Property, which includes Building 970 and the former NEX gas station, and will be sold for future commercial/industrial use (Figures 3 and 4). The Property was evaluated for a commercial/industrial use scenario, which is a nonresidential standard, based on the planned reuse of the property. Total cancer risk estimated to the occupational receptor in the Property was  $6.5 \times 10^{-6}$  and  $1.6 \times 10^{-5}$  based on the federal and Cal/EPA unit risk factors for benzene, respectively. This value falls within the risk range ( $1 \times 10^{-4}$  to  $1 \times 10^{-6}$ ) that warrants a site-specific risk management decision about the suitability of the property for its intended future reuse. At the time that the Navy conducted the risk assessment, ethylbenzene was not listed as a carcinogen on U.S. EPA's preliminary remediation goal table. Recently, DTSC added ethylbenzene to the estimated cancer risks presented in the Final Revised Risk Assessment and documented the results in a memorandum (DTSC 2003a). The estimated cancer risks stated above reflect the addition of ethylbenzene, as well as a minor correction to the Sale Area estimated risks by the Navy. The total hazard or hazard index (total non-cancer risk) in the Property was below 1.0 for the occupational receptor. As stated in U.S. EPA guidance OSWER Directive No. 9355.0-30 (EPA 1991), remedial action generally is not warranted at a site if the total cancer risk is below  $1 \times 10^{-4}$  and the hazard index is below 1.0. The total cancer risk estimates in the Sale Area are most likely overestimated, and future remediation activities

are not necessary to protect the health of future occupational receptors. Additionally, the risk assessment evaluated the potential risk to an excavation worker at Former UST Site 957/970. It should be noted that the risk assessments were generally based on the risk assessment methodology provided by U.S. EPA's Risk Assessment Guidance for Superfund, Volume I: Human Health Evaluation Manual (HHEM 1989). In addition, supplemental guidance from the DTSC was also incorporated into these risk assessments to make it more specific to Cal/EPA methodology. Estimates of total cancer risk for the excavation worker are  $4.78 \times 10^{-7}$  and  $1.73 \times 10^{-6}$  for the Property, based on the federal and Cal/EPA unit risk factors for benzene, respectively. The hazard index for the excavation worker in the Property is 1,130. These risks suggest that excavation workers should take precautionary measures (e.g., proper personal protective equipment) when working at the site. Therefore, based on risk assessment results, DTSC's concurrence (DTSC 2001b), and in accordance with U.S. EPA guidance (EPA 1991), the Property is suitable for its intended commercial/industrial use.

Beginning in April 2000, the Building 970 hydraulic lift and oil/water separator removal was conducted (Battelle and RRM 2000). Subsurface features removed from the site included three hydraulic lifts, two oil/water separator systems, associated lines, floor drains, and four buried drums (acting as subsurface storage tanks) with associated piping. During the removal, petroleum hydrocarbon-affected soil was encountered and over excavation activities were performed. Over excavation activities were conducted in accessible areas until contaminant concentrations were below cleanup levels or U.S. EPA Region 9 residential preliminary remediation goals (PRG). To protect the structural integrity of Building 970, excavation activities were not conducted underneath the building footers or internal walls. Limited petroleum hydrocarbon contamination is still present in these areas (Figure 5). An estimate of the volume of hydrocarbon and metals-impacted soils remaining in place is 120 cubic yards. Soil commercial/industrial PRGs were exceeded at one location on the Property (Battelle and RRM 2000). Potential exposure is limited because the soils are primarily covered with asphalt and, with exception of the areas around the Building 970 foundation, are located at depths greater than 6 feet. Since the potential for exposure would likely be greater by disturbing the soils than leaving them in place and the concentrations are likely to continue to decline due to natural biodegradation processes, the soils will be left in place. RWQCB and DTSC concurred with all remediation is complete for the hydraulic lift and oil water separator removal from Building 970 in a letter dated April 16, 2003 (RWQCB 2003).

In August 2000, RWQCB issued Order No. 00-064, which identified requirements for a portion of DODHF Novato, including Former UST Site 957/970 (RWQCB 2000). These requirements included the development of a work plan and the completion of an RI to define the vertical and horizontal extent of contamination in and adjacent to the Property. Beginning in September 2000, the Navy conducted an RI at Former UST Site 957/970 to comply with Order No. 00-064. The RI included installing and replacing monitoring wells, sampling monitoring wells on a quarterly basis, collecting soil samples, and characterizing local lithology (Battelle 2001a). The results of the investigation indicated the presence of a significant petroleum hydrocarbon plume in groundwater and the presence of petroleum hydrocarbon contamination in soil.

In March 2002, a Final CAP was submitted in accordance with the RWQCB order No. 00-064 (Battelle 2002b). The results of the site assessment conducted in the CAP indicated that the releases had been stopped and that contaminant sources had been removed. Additionally, BTEX constituent plumes were decreasing in size and the overall maximum and average MTBE concentrations and estimated dissolved mass of MTBE have generally declined over time. The dissolved benzene mass estimate declined from 5.0 kg to less than 0.1 kg between May 1998 and November 2002. The dissolved MTBE mass estimate declined from 287 kg to 124 kg, from November 1998 to November 2002, respectively. Also, the estimated center of mass of MTBE dissolved in groundwater receded nearly 300 feet upgradient between 1999 and 2001 (Battelle 2002b).

In accordance with RWQCB Order No. 00-064, the CAP presented several corrective action strategies. RAOs were established, and four corrective action alternatives were evaluated in detail. One of the four alternatives, biosparging with monitored natural attenuation (MNA) and institutional controls, was selected as the corrective action alternative that would most efficiently and effectively achieve the RAOs established for the site (Battelle 2002b).

The Final Remedial Design and Work Plan was submitted in January 2003, which describes the design and implementation of the remediation system, and how the RAOs will be achieved (Battelle 2002a). The biosparging system began operation in August of 2002. It is located to the North of the Property by a minimum of 250 feet and is not intended or expected to affect the Property. It is expected to operate for 1.5 years, after which MNA will officially commence (some MNA data will be collected prior to the official MNA start date). During the MNA phase,

results of quarterly groundwater monitoring will be presented in quarterly and annual reports. The duration of the MNA period will be evaluated annually.

Covenants and restrictions related to the corrective action for this site are presented in Section 7.2.

## **6.2 ENVIRONMENTAL FACTORS THAT POSE NO CONSTRAINTS OR NOTIFICATIONS**

### **6.2.1 Storm Sewer System**

The results of the “Final Environmental Baseline Survey Sampling and Analysis Report” (PRC and U&A 1997a) indicated the need for storm drain cleaning at Parcels 29 and 30 of the Property. During the summer of 1997, storm drain cleaning and sediment removal activities were conducted at Parcel 30 (IT 1997). Activities included flushing the drains with high-pressure water and using a vacuum truck to remove sediment and wastewater. Additionally, a concrete drainage channel (located on the southern end of Building 970) covered by metal grates was washed down using high-pressure water. A report summarizing these activities was submitted to the regulatory agencies in July 1997 (IT 1997).

RWQCB concurred with the no-further-action recommendation for Parcels 28, 29, and 30 in a letter dated November 17, 1997 (RWQCB 1997b). DTSC concurred with the no-further-action recommendation for Parcels 28 and 29 in a letter dated December 8, 1997 (DTSC 1997e).

### **6.2.2 Sanitary Sewer System**

The Utility Technical Study for DODHF Novato, completed by Bechtel National Inc, indicates that the sanitary sewer system in the Property is in good condition and requires no repairs. The Study confirmed that there were no substantial historical cracks or leaks in the sanitary sewer system in the Property (Bechtel 1985). No further investigations or sampling activities are required for the sewer systems (PRC and U&A 1997b).

### **6.2.3 Polychlorinated Biphenyls**

A survey of all oil-filled electrical equipment on the Property was performed in 1993. Two transformers contained polychlorinated biphenyls (PCBs) at greater than 500 parts per million (ppm), thirteen transformers contained PCBs between 50-499 ppm and twenty one transformers contained PCBs between 5-49 ppm. The condition of this equipment is good with no signs of leaks. Replacement of the

transformers which contain 50 ppm PCBs or greater was completed in 1995. In late 1997 it was discovered that this survey had deficiencies since additional transformers were found that were not documented in the original survey (SSPORTS 1998c). A re-verification survey was conducted. Ten additional transformers were found to contain levels of PCBs greater than 50 ppm. These transformers were removed and disposed of. In addition, all transformers found during this survey that were between 5 ppm and 50 ppm and not in service were removed and disposed of. A follow-up survey by SSPTS did not identify additional electrical equipment with PCBs greater than 5 ppm on parcels in this FOST (SSPTS 1998c).

#### **6.2.4 Radon**

The DoD policy for radon is to provide relevant assessment data but not to perform assessment and mitigation before transfer of BRAC property, unless otherwise required by applicable law (DoD 1994b). A radon survey of the DODHF Novato housing areas was conducted in 1990 under the Navy Radon Assessment and Mitigation Program. A total of 86 stationary detectors were placed in selected housing units in DODHF Novato. The sampling results indicated that all concentrations of radon were below U.S. EPA's action level of 4 picocuries per liter (ERM-West 1995a). No further action apart from disclosure is required (Environ 1997).

#### **6.2.5 Pesticide and Herbicide Usage**

No evidence exists to suggest that pesticides (including insecticides, termiticides, and rodenticides) and herbicides, other than those ordinarily and routinely applied in a manner consistent with the standards for licensed application, were ever used at this site. These agents were not applied extensively to any area of the Property.

##### **6.2.5.1 Pesticides and Herbicides Used**

A review of past records indicates the following were typical of herbicides and pesticides that were used. Herbicides which may have been used at DODHF Novato include the following: XL 2G, Team 2G, Surflan A.S., Ronstar 50 WP, Roundup, and Ronstar G.

#### **6.2.5.2 Insecticides, Termicides, and Rodenticides Used**

Insecticides, termicides, and rodenticides which may have been used at DODHF Novato include the following: Dursban TC, PT-515 (Wasp Freeze), Vaponite 2E, Dursban 4E, Dursban-TC, Drione, Ficam W, Diazinon 4E, Sevin 80W, and Anti-coagulant Bait Blocks.

#### **6.2.5.3 Pesticide and Herbicide Management**

Pesticides and herbicides were applied intermittently on an as-needed basis at DODHF Novato either by personnel from the Navy Public Works Pest Control Department or by contractor personnel. All personnel were trained and licensed in the proper and legal application of the pesticides and herbicides listed above. All pesticides and herbicides were applied per the manufacturer's directions, in accordance with the State and Federal EPA registered pesticide or herbicide label directions, and in accordance with the installation's annually approved pest management plan. Since the pesticides and herbicides were routinely applied in a manner consistent with the standards for licensed application, they likely do not pose a threat to human health and the environment. In addition, there is no indication that reportable quantities of pesticides were stored at DODHF Novato.

#### **6.2.6 EBS Sampling and Analysis Program**

Based on the results of the EBS Sampling Report (PRC and U&A 1997a), Parcels 28, 29, and 30 are classified as ECP Area Type 2, since they are impacted by the NEX Gas Station petroleum release (PRC and U&A 1997b).

The USTs, waste-oil tank, oil-water separator, hydraulic lifts and appurtenances associated with the former NEX Gas Station are being addressed under the Navy's UST Program and Regional Water Quality Control Board Order 00-064. Sampling was conducted to address chemical storage and hazardous waste generation at Parcel 29 (ERM-West 1996). Twelve soil samples were collected from this area. Analytical results of soil samples were below screening criteria for volatile organic compounds (VOCs), pesticides, and PCBs. Metals concentrations were below the geometric mean of regional background, or within the range of regional background concentrations (PRC and U&A, 1997b). TPH concentrations were less than screening criteria, except for TPH-motor-oil collected from a location adjacent to a hydraulic lift, which is being addressed under a separate program (Battelle and RRM 2000).

Based on the analytical results, no further action was recommended under the EBS sampling and analysis program (PRC and U&A, 1997a, 1997b).

Based on the analytical results, no further action was recommended under the EBS sampling and analysis program (PRC and U&A, 1997a, 1997b) for all parcels of this Property.

DTSC concurred with the no-further-action recommendation for hazardous substances for Parcels 28 and 29 in a letter dated December 8, 1997 (DTSC 1997e) and for hazardous substances for Parcel 30 in a letter dated June 30, 1997 (DTSC 1997d). RWQCB concurred with the no-further-action recommendation for Parcel 30 in a letter dated June 16, 1997 (RWQCB 1997a).

#### **6.2.7 Adjacent Property**

After review of the “Final Remedial Action Plan for 800B and Ammo Hill Parcels GSA Phase II Sale Area” (Army 1998), the “Final Report on Remedial Investigation and Corrective Measures Study for the UST Site at Building 827” (AGS 1999), and the basewide EBS and SEBS reports for DODHF Novato, with the exception of petroleum releases discussed in Section 6.1.3, no other potential contaminant source areas have been identified at adjacent property. The following sites were determined not be potential sources of contamination to the Property:

##### **6.2.7.1 Navy Dry Cleaner**

The UST site of the former Navy dry cleaner, Building 827, located several parcels from the Property, was closed and poses no potential risks (RWQCB 2000b and DTSC 2001). An evaluation of potential human health and ecological risk concluded that there was no significant risk to human and ecological health. Furthermore, the groundwater generally flows northwest, away from the Property. Therefore, the UST site is not considered a potential source of contamination to the Property and is not further discussed in this FOST.

##### **6.2.7.2 Army Landfill**

A historic Army landfill exists to the northeast of the Property. The Army conducted a risk assessment on the buffer zone between the landfill and Hamilton Meadows and on the Hamilton Meadows development, to determine the potential health risks to residents and construction workers from VOCs migrating from Landfill 26 into the development (CH2MHILL 2002). The risk assessment concluded there are no excess lifetime cancer risks or non-cancer health effects

higher than the most conservative regulatory levels of concern. DTSC approved the risk assessment conclusions in a letter dated April 22, 2003 (DTSC 2003). The Property is located approximately 1,800 feet up gradient of the landfill. Due to the distance of the Property from the landfill, and flow of groundwater away from the Property toward the landfill, there is a sufficient buffer between the landfill and the Property to conclude that the landfill does not likely impact the Property. Accordingly, the landfill is not considered to be a potential source of contamination to the Property and therefore the landfill is not discussed further in this FOST.

## **7.0 CONVEYANCE CONDITIONS AND NOTIFICATIONS**

The Property will be transferred in accordance with the federal real property disposal laws. The proposed deed for transfer of the Property will contain applicable CERCLA 120(h) notices, covenants and warranties, as well as additional notifications and restrictions indicated below.

### **7.1 NOTICES**

#### **7.1.1 Notice of Hazardous Substances**

Whenever federal property transfers are conducted for properties on which storage, release, or disposal of hazardous substances occurred, CERCLA § 120(h) requires that each deed into which the parties enter for the property transfer include a notice of the type and quantity of hazardous substances stored, released, or disposed of, and the times such events took place. The requirement for notice applies only when hazardous substances are or have been stored in quantities greater than or equal to 1,000 kilograms, or the CERCLA reportable quantity for the particular hazardous substance, whichever is greater, or when the hazardous substances are or have been released in quantities greater than or equal to the CERCLA reportable quantity. Hazardous substances do not include petroleum products. Table 3 presents the notice for storage, release, or disposal of hazardous substances on the Property.

#### **7.1.2 Indemnification**

The deed will contain a statement that the Grantor recognizes its obligations under Section 330 of the National Defense Authorization Act of 1993 (Pub. L. No. 102-484), as amended, regarding indemnification of transferees at closing Department of Defense property.



### **7.1.3 Asbestos-Containing Material**

The deed will contain a notice that asbestos and ACM exist in buildings and structures located on the Property. In addition, the deed will contain a statement to the effect that the Grantee acknowledges receipt of documentation disclosing the presence of any known asbestos or ACM in the buildings and structures on the Property.

### **7.1.4 Lead-Based Paint**

The deed will contain a notice that due to the age of the buildings and structures it is presumed that they contain LBP. Lead from paint, paint chips, and dust can pose health hazards if not managed properly.

## **7.2 COVENANTS, WARRANTIES, AND RESTRICTIONS**

### **7.2.1 All Remedial Action Has Been Taken**

The deed will include a covenant by the United States, made pursuant to the provisions of CERCLA § 120(h)(3)(A)(ii)(I), warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the Property has been taken before the date of transfer.

### **7.2.2 Additional Remediation Obligation**

The deed will include a covenant by the United States, made pursuant to the provisions of CERCLA § 120(h)(3)(A)(ii)(II), warranting that any remedial or corrective action found to be necessary after the date of the deed shall be conducted by the United States; provided, however, that the covenant shall not apply with respect to any release or threat of release caused by Grantee or its successors and assigns.

### **7.2.3 Right of Access**

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, granting to the United States right of access to the Property, pursuant to the provisions of CERCLA § 120(h)(3)(A)(iii), when any remedial or corrective action is found to be necessary after the date of such transfer.

#### **7.2.4 Ongoing Corrective Actions**

The deed will include a covenant by the Grantee on behalf of itself, its successors and assigns, granting the United States, or its officers, agents, employees, contractors, and subcontractors or any Federal, State or local regulatory agency the right, upon reasonable notice to the Grantee, to enter and inspect the Property to ensure the viability of the selected land use controls or to perform ongoing corrective actions. The ongoing corrective actions include sampling and maintenance of the subsurface groundwater wells and soil-gas probes as described in the CAP.

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, that construction and/or operations on the Property shall not interfere with the ongoing corrective actions being conducted by or for the United States or any Federal, State, or local regulatory agency.

#### **7.2.5 Soil and Groundwater Management**

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, that (a) dewatering excavations is prohibited unless conducted in accordance with a Navy, DTSC, and RWQCB approved workplan; (b) disturbing or using existing groundwater wells is prohibited without the prior approval of the Navy, DTSC, and RWQCB; (c) installing groundwater production wells for residential, municipal, agricultural, or industrial use is prohibited without the written approval of the Navy, DTSC, and RWQCB; and (d) conducting actions which could affect the gasoline constituent groundwater plumes (e.g., construction or creation of groundwater recharge areas, surface impoundments, or disposal trenches) is prohibited, unless conducted in accordance with a Navy, DTSC, and RWQCB approved workplan.

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, that it will not conduct activities which will disturb the soil at or below 5 feet below current ground surface (e.g., excavation, grading, removal, trenching, filling, earth movement, or mining) on the entire Property without a Navy, DTSC, and RWQCB approved soil management plan and a health and safety plan. The owner or operator shall submit written notification and request for approval of the aforementioned plans no later than thirty days prior to the date on which the owner or operator desires to commence the proposed restricted activity.

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, that it will not conduct activities which will disturb the soil at or below 3 feet below current ground surface in the

area of known residual contamination beneath the foundation of Building 970 (shown on Figure 5) on the Property without a Navy, DTSC, and RWQCB approved soil management plan and a health and safety plan. The owner or operator shall submit written notification and request for approval of the aforementioned plans no later than thirty days prior to the date on which the owner or operator desires to commence the proposed restricted activity.

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, that removal and disposal of contaminated soil or groundwater shall be conducted in accordance with all applicable Federal, State, and local regulations governing removal, transport, and disposal of hazardous substances and hazardous waste.

#### **7.2.6 Residential Use Restriction**

The deed will contain a covenant by the Grantee on behalf of itself, its successors and assigns, that construction and occupation of residential structures (including any mobile home or factory built housing constructed or installed for use as residential human habitation), hospitals for humans, schools for persons under 21 years of age, or daycare centers for children on the Property is prohibited.

## 8.0 FINDING OF SUITABILITY TO TRANSFER

Based on the foregoing information, analysis, and environmental conditions, I find that the property is environmentally suitable for transfer by deed for commercial use, subject to compliance with the covenants, conditions, and restrictions set forth in this FOST.

I have concluded that the requirements of CERCLA § 120(h)(3) have been met for the property and that the property can be used with acceptable risk to human health and the environment, and without interference with ongoing corrective actions.

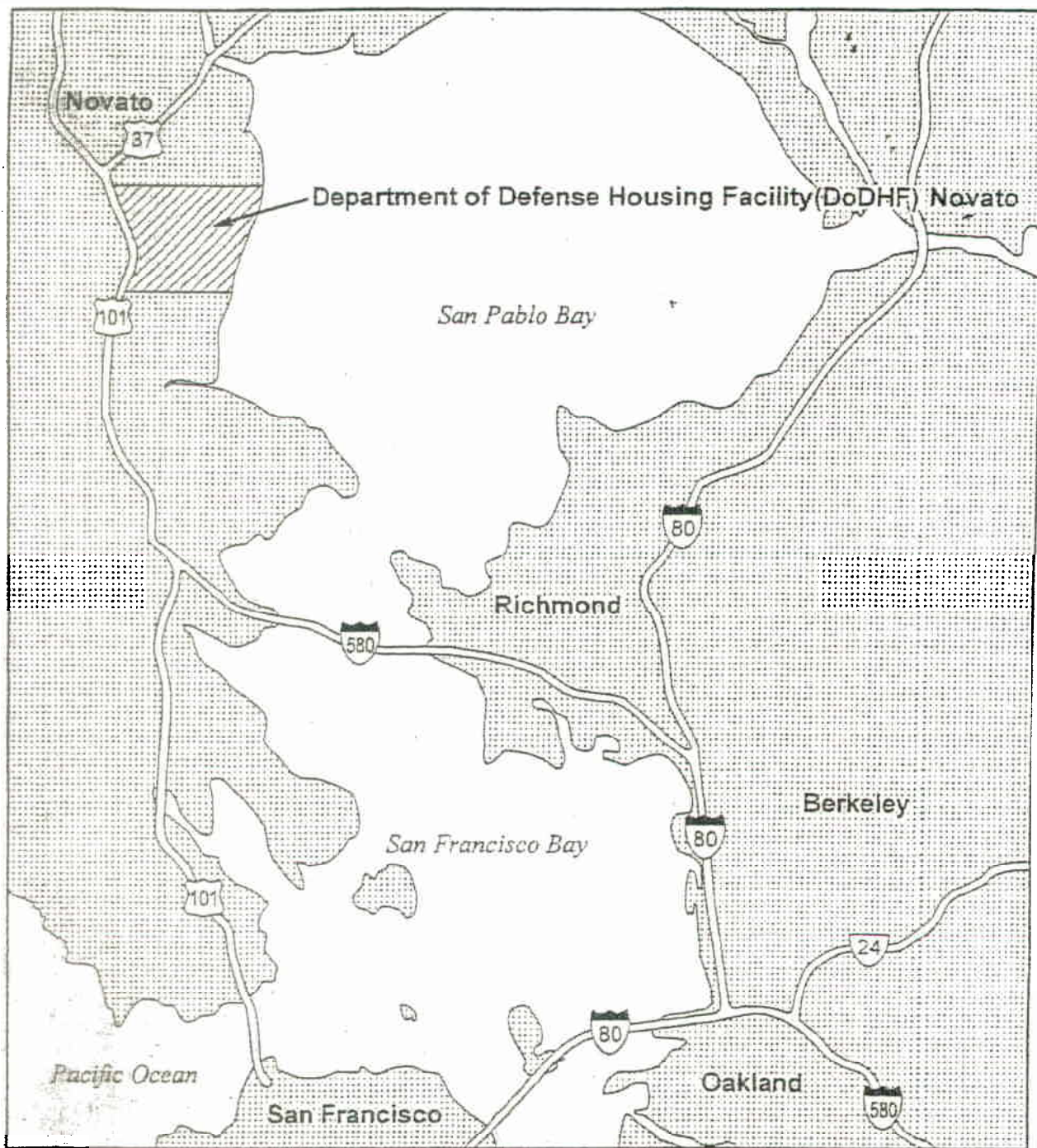


D. S. BIANCHI  
CAPTAIN, CEC, USN  
Commanding Officer  
Engineering Field Activity West  
Naval Facilities Engineering Command

11 AUG 2003

Date

## FIGURES



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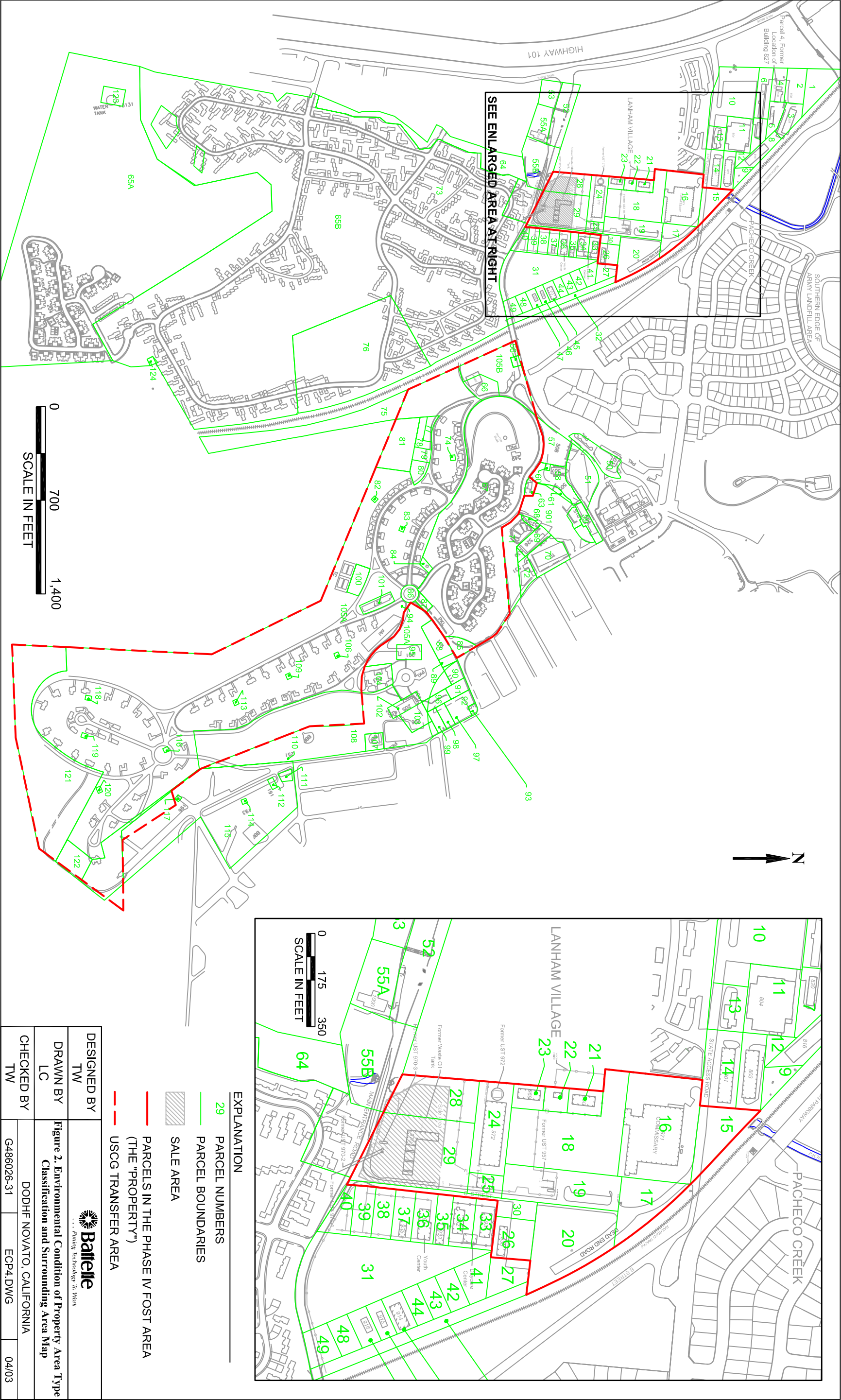
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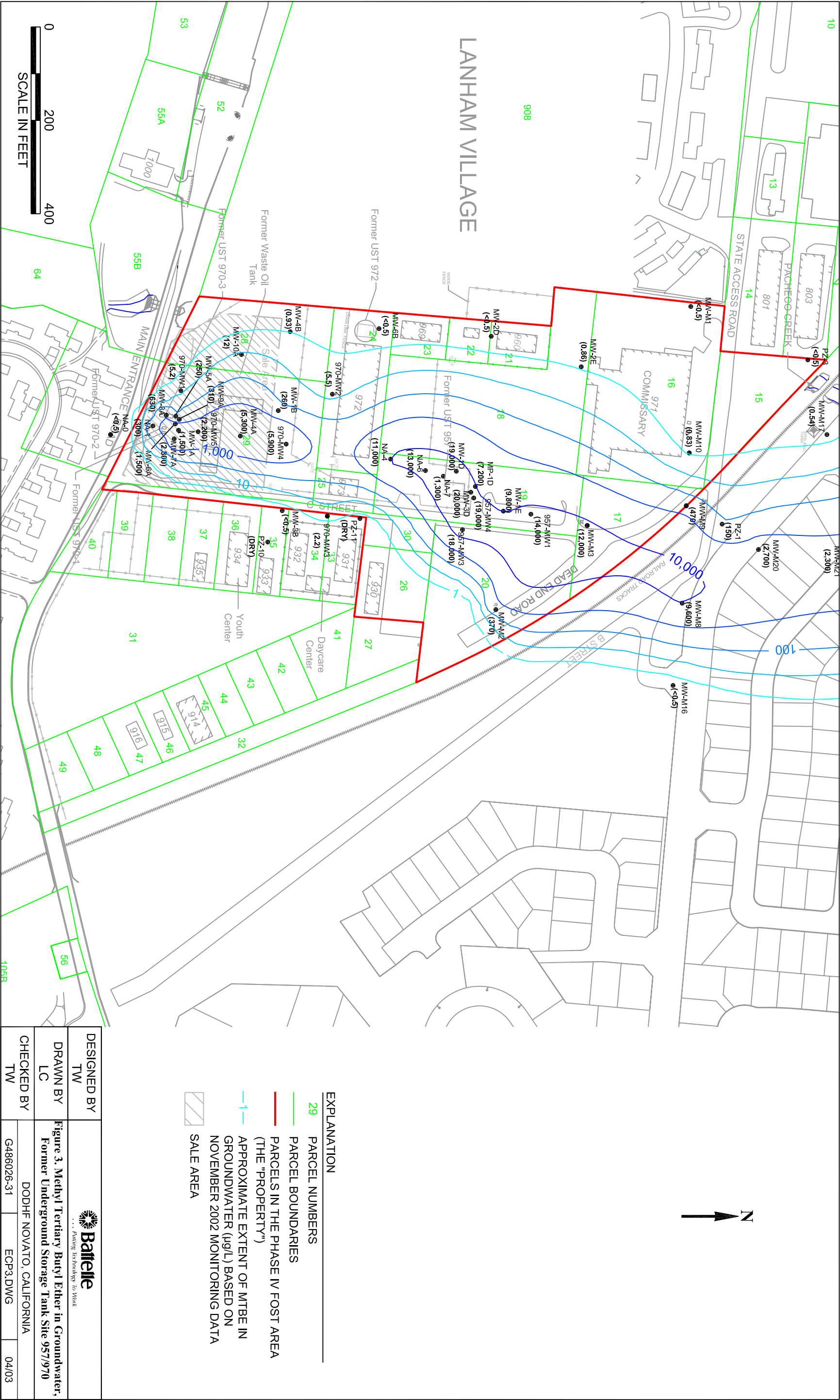
DEPARTMENT OF THE NAVY  
SAN DIEGO  
DEPARTMENT OF DEFENSE HOUSING FACILITY  
NAVAL FACILITIES ENGINEERING COMMAND  
SOUTHWEST DIVISION  
CALIFORNIA  
NOVATO, CALIFORNIA

**FIGURE 1**  
**REGIONAL LOCATION MAP**  
**DoDHF NOVATO, CALIFORNIA**

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CONTR. CONTR. NO.		
SCALE	AS SHOWN	SHEET 1 OF 1

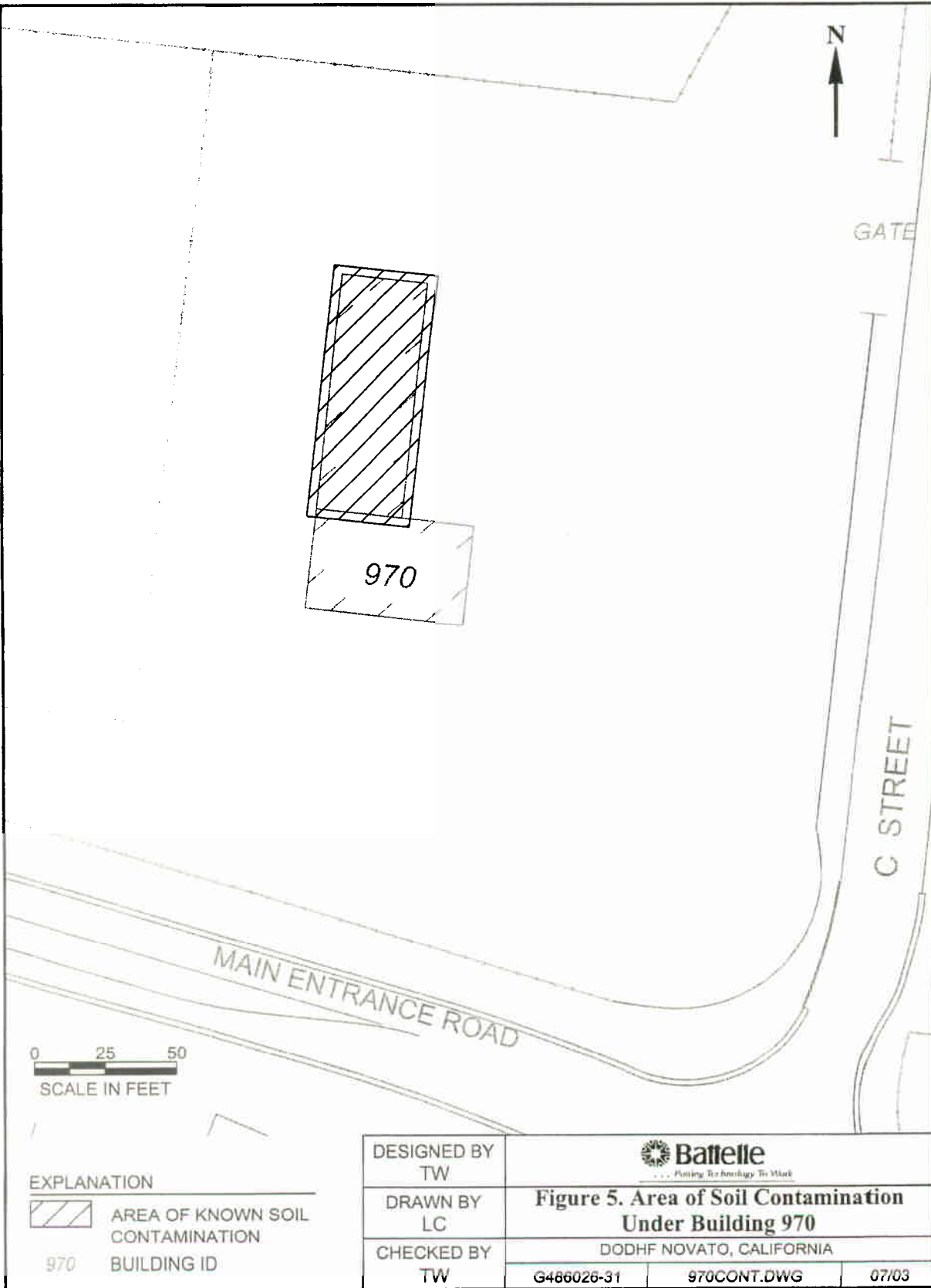












## TABLES

**TABLE 1**

**SUMMARY OF HISTORICAL USE AND CURRENT STATUS OF BUILDINGS  
ON PARCELS IN THE FINAL PHASE IVC FINDING OF SUITABILITY TO TRANSFER  
DEPARTMENT OF DEFENSE HOUSING FACILITY, NOVATO, CALIFORNIA**

Parcel	Parcel Acreage	Building Number	Description (Current and Former Use)	Comments
28	0.77	Open Space	Parking area	--
29	1.91	970	Automobile service station, built in 1974.	Planned for demolition.
30	0.02	Open Space	N/A	--

Notes:

N/A      Not applicable

--        No comment

Source:

Environmental Resources Management-West, Inc. 1995a. "Basewide Environmental Baseline Survey/Community Environmental Response Facility Act Report for Department of Defense Housing Facility, Novato, California." October 19.

PRC Environmental Management, Inc. and Uribe & Associates. 1997b. "Final Phase I Supplemental Environmental Baseline Survey, Department of Defense Housing Facility, Novato, California." April 21.

Novato Unified School District. 1996. "Application for Public Benefit Transfer of Surplus Federal Real Property for Educational Uses." May.

**TABLE 2**

**ENVIRONMENTAL CONDITION OF PROPERTY (ECP) AREA TYPE DEFINITIONS  
FINAL PHASE IVC FINDING OF SUITABILITY TO TRANSFER  
DEPARTMENT OF DEFENSE HOUSING FACILITY, NOVATO, CALIFORNIA**

<b>ECP Area Type 1:</b> Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
<b>ECP Area Type 2:</b> Areas where only release or disposal of petroleum products has occurred.
<b>ECP Area Type 3:</b> Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
<b>ECP Area Type 4:</b> Areas where release, disposal, and/or migration of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken.
<b>ECP Area Type 5:</b> Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are under way, but all required remedial actions have not yet been taken.
<b>ECP Area Type 6:</b> Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
<b>ECP Area Type 7:</b> Areas that are not evaluated or require additional evaluation.

TABLE 3

**NOTICE OF HAZARDOUS SUBSTANCES STORED, DISPOSED OF, OR RELEASED  
INTERNAL REVISED DRAFT PHASE IV FINDING OF SUITABILITY TO TRANSFER  
DEPARTMENT OF DEFENSE HOUSING FACILITY, NOVATO, CALIFORNIA**

The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA of "Superfund") 42 U.S.C. Section 9620(h).

Parcel Number	Building Number	Hazardous Substance(s)	CAS #	Dates of Storage, Disposal, or Release	Stored (S), Disposed of (D), or Released (R)	Quantity Stored, Disposed of, or Released (Kilograms)
29	970	Lead	7439-92-1	Between 1974 and 1992	R	Unknown